

Gail E. Good
Director, Air Management Program
Wisconsin Department of Natural Resources
101 S. Webster St.
Box 7921
Madison, Wisconsin 53707-7921

Dear Ms. Good:

On behalf of the U.S. Environmental Protection Agency, I would like to thank you for your January 15, 2016 submittal identifying sources to be characterized under the sulfur dioxide (SO₂) Data Requirements Rule (DRR).¹ I also appreciate your letter dated March 11, 2016 responding to information provided by John Summerhays of my staff. I am writing to respond to your submittal and provide additional information about the next steps in this source characterization effort, which will result in important data that states and EPA will use to protect public health.

On August 21, 2015, EPA finalized the DRR, which requires state air agencies to characterize ambient SO₂ levels in areas with large sources of SO₂ emissions to help implement the 1-hour SO₂ National Ambient Air Quality Standard (NAAQS). Under the DRR, state air agencies must, at a minimum, model or monitor air quality around sources that emit 2,000 tons per year (tpy) or more of SO₂ and that are not located in an area already designated nonattainment. For a source listed because it emitted more than 2,000 tpy, an air agency may avoid this requirement by adopting federally enforceable emission limits by January 13, 2017, that ensure that the source will emit less than 2,000 tpy of SO₂.

Under the DRR implementation schedule, state air agencies were required to submit to EPA by January 15, 2016, a list that identifies all sources within the state's jurisdiction with SO₂ emissions of 2,000 tpy or more during the most recent year for which emissions data are available. Air agencies or EPA may also include sources with SO₂ emissions below 2,000 tpy on a state's source list where characterization of air quality around the sources is warranted.

EPA has reviewed your agency's submittal and is identifying an additional source that we believe warrants air quality characterization. EPA is adding the following such source to your state's list of applicable sources under the DRR:

Source(s)	County	Estimated Average Emissions
USG Interiors	Walworth	736 tpy

¹ "Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS); Final Rule," 80 *Federal Register* 51052, August 21, 2015.

We find significant potential for ambient SO₂ concentrations near this source to be exceeding the NAAQS. Therefore, we believe that listing this source and requiring air quality characterization under the DRR is warranted. Further information on this source is provided in the attachment to this letter.

The next key milestone for purposes of DRR implementation is July 1, 2016, the date by which each air agency must identify, for each listed source, the approach it will use to characterize air quality in the respective area (air quality modeling, ambient monitoring, or establishment of a federally enforceable emission limit).

For sources that an air agency decides to evaluate through air quality modeling, the DRR requires the air agency to submit to the EPA Regional Administrator a modeling protocol by July 1, 2016, and the completed modeling analysis by January 13, 2017. For sources that an air agency decides to evaluate through ambient monitoring, the air agency will need to identify appropriate sites to characterize peak 1-hour SO₂ concentrations, and may need to relocate existing monitors or install new monitors at such sites. As further required under the DRR, the air agency must submit information about monitoring sites to the EPA Regional Administrator by July 1, 2016, as part of its annual monitoring network plan and in accordance with EPA's monitoring requirements specified in 40 CFR part 58. The air agency must also ensure that ambient monitors will be operational by January 1, 2017.

As noted earlier, in lieu of characterizing air quality around a source with SO₂ emissions that is at or above 2,000 tpy, air agencies may indicate by the July 1, 2016 deadline that they will adopt federally enforceable emissions limitations that will limit the SO₂ emissions of a source to below 2,000 tpy. Such limits must be adopted and effective by January 13, 2017. The DRR requires that an air agency provide a description of the requirements and emission limits that the air agency intends to apply for the affected sources in their July 1, 2016, submittal.

We look forward to a continued dialogue with you and your staff as you prepare the required submittals that are due on July 1, 2016. To assist in this process, we are available to discuss any technical issues that you may have concerning either modeling or monitoring in order to assist you in meeting this requirement.

Please note that a copy of each state air agency's submittal and a compiled national list of sources subject to DRR requirements are posted on EPA's SO₂ implementation website at www3.epa.gov/airquality/sulfurdioxide/implement.html. We also plan to post this letter on that site and to update the compiled national list with the source added by this letter as described above in the near future.

Again, thank you for your letter and for your efforts to implement this important standard. For additional information concerning the DRR, please visit our SO₂ implementation website listed above. For additional information regarding designations under the SO₂ standard, please visit our website at www.epa.gov/so2designations. Should you have any questions, please do not hesitate to call me or contact George Czerniak, Air and Radiation Division Director, at 312-353-2212 or czerniak.george@epa.gov.

Sincerely,

Robert A. Kaplan
Acting Regional Administrator

Attachment